

REMARKS

In the Final Office Action, claims 1-6, 8, 9, 11, 23 and 25-31 were pending and rejected by the Examiner. In this response, Applicants offer to amend claim 27. Claims 7, 10, 12-22, 24 and 32-37 remain cancelled in previous responses, without prejudice. No new matter has been introduced. The amendment is made in accordance with the suggestion from the Examiner, therefore merely conformance in nature. Thus, no new search is required. Further, for reasons set forth below, the amendments place the claims in condition of allowance.

Accordingly, entry of the offered amendments, and allowance of the remaining pending claims 1-6, 8, 9, 11, 23 and 25-31 are respectfully requested.

CLAIM REJECTIONS UNDER 35 U.S.C. § 101

Claims 27-31 were rejected under 35 USC § 101 for being directed to non-statutory subject matter.

Applicants have amended claim 27 to recite “a machine-readable non-transitory storage medium” in accordance with the suggestion from the Examiner. Applicants believe amended claim 27 is directed to statutory subject matter and thereby patentable under 35 USC § 101. Dependent claims 28-31 depend from claim 27, incorporating its recitations, and Applicants believe claims 28-31 are thereby also directed to statutory subject matter. Reconsideration of claims 27-31 in the light of amendments is respectfully requested.

CLAIM REJECTIONS UNDER 35 U.S.C. § 103

1. Claims 1-2, 5-6, 9, 11, 23, 27-31 were rejected as being unpatentable over U.S. Patent No. 7,406,709 (hereinafter “Maher”), in view of U.S. Patent Application Publication No. 2002/0035699 (hereinafter “Crosbie”) under 35 U.S.C. § 103(a).

Claim 1 is directed to a method comprising, in pertinent part:

“...wherein the second device uses an address that is *globally routable* on the internal and the external networks...” (Emphasis added).

The Final Office Action, on page 6, first concedes that Maher does not disclose the recitation of “wherein the second device uses an address that is globally routable,” and subsequently cites paragraph [0008] of Crosbie for teaching of this recitation.

However, the cited portion of Crosbie explicitly teaches that “[i]f, however, the mobile device moves to an access point connected to another subnet ... The mobile device would typically *be required to obtain a new IP address* and so break the previous connection.” (Emphasis added.)

Since Crosbie teaches a mobile device that is required to obtain a new IP address when moving from one subnet to another, Crosbie cannot be said to be teaching “the second device uses an address that is *globally routable* on the internal and the external networks” as recited in claim 1. Therefore, the combination of Maher and Crosbie fails to establish a *prima facie* obviousness rejection of claim 1 for at least this reason.

Independent claims 23 and 27 recite in general similar subject matter to claim 1. Claims 2, 5, 6, 9, 11, and 28-31 depend from one of the claims 1, 23 or 27 respectively, incorporating their recitations. Therefore, for at least the above stated reasons, the combination of Maher and Crosbie fails to establish a *prima facie* obviousness rejection for claims 2, 5, 6, 9, 11, 23, 27 and 28-31 as well.

2. Claim 3 was rejected as being unpatentable over Maher and Crosbie, and further in view of U.S. Patent Application Publication No. 2002/0103898 (hereinafter Moyer) under 35 U.S.C. § 103(a).

Claim 3 depends from claim 1, incorporating its recitations. The Examiner cited Moyer as disclosing “wherein the presence advertisement is delivered in accordance with the UPnP Simple Service Discovery Protocol (SSDP)” in original claim 3. However, Moyer fails to cure the deficiency of Maher and Crosbie with regard to amended claim 1. Therefore, due to at least the reasons discussed above in section 1, the combination of Maher, Crosbie and Moyer fails establish a *prima facie* obviousness rejection for claim 3 under 35 U.S.C. § 103(a).

3. Claim 4 was rejected as being unpatentable over Maher and Crosbie, further in view of U.S. Patent Application Publication No. 2003/0217136 (hereinafter Cho) under 35 U.S.C. § 103(a).

Claim 4 depends from claim 1, incorporating its recitations. The Examiner cited Cho as disclosing “receiving network traffic from the second device corresponding to the second device requesting a UPnP Device Description Document from the first device.” However, Cho fails to cure the deficiency of Maher and Crosbie with regard to claim 1. Therefore, due to at least the reasons discussed above in section 1, the combination of Maher, Crosbie and Cho fails to establish a *prima facie* obviousness rejection of claim 4.

4. Claims 25 and 26 were rejected as being unpatentable over Maher and Crosbie, further in view of Cho and the article “UPnP Security Ceremonies Design document for UPnP Device Architecture 1.0” (hereinafter Ellison), under 35 U.S.C. § 103(a).

Claims 25 and 26 depend from amended claim 23, incorporating its recitations. The Examiner cited Cho and Ellison as disclosing various recitations in original claims 25-26. However, Cho and Ellison singly or in combination fail to cure the deficiency of Maher and Crosbie with regard to amended claim 23. Therefore, due to at least the reasons discussed above in section 1, the combination of Maher, Crosbie, Cho and Ellison fails to establish a *prima facie* obviousness rejection of claims 25 and 26.

5. Claim 8 was rejected as being unpatentable over Maher and Crosbie, and further in view of U.S. Patent Application Publication No. 2005/0111382 (hereinafter Le) under 35 U.S.C. § 103(a).

Claim 8 depends from amended claim 1, incorporating its recitations. The Examiner cited Le as disclosing “communication within the internal network is accord with an IPv6 compatible Internet protocol” in original claim 8. However, Le fails to cure the deficiency of Maher and Crosbie with regard to amended claim 1. Therefore, for at least the reasons discussed above in section 1, the combination of Maher, Crosbie and Le fails to establish a *prima facie* obviousness rejection of claim 8.

CONCLUSION

In view of the foregoing, Applicant respectfully submits that all pending claims are in condition for allowance. Early issuance of the Notice of Allowance is respectfully requested.

Please charge any shortages and credit any overages to Deposit Account No. 500393.

Respectfully submitted,
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